

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No. 1:17-cv-00365-DAE-AWA
)	
GRANDE COMMUNICATIONS)	
NETWORKS LLC,)	
)	
Defendant.)	

**PLAINTIFFS' OBJECTIONS AND COUNTER-DESIGNATIONS TO
DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S
DEPOSITION DESIGNATIONS**

Plaintiffs submit the following Objections and Counter-Designations to Defendant Grande Communications Networks, LLC's Deposition Designations pursuant to the Court's Order Setting Jury Selection/Trial and Related Deadlines (ECF No. 275). Plaintiffs reserve the right to amend these objections and counter-designations, and to interpose additional objections and counter-designations, based on evidence or arguments that Grande presents or attempts to present at trial.

Code	Objection
A	Argumentative
ATTY	Attorney objections/colloquy not removed
AA	Asked and answered/duplicative
BER	Best Evidence Rule
C	Compound
CC	Calls for conclusion
D	Designation incomplete; incomprehensible
IH	Improper hypothetical
SM	Subject to a pending/forthcoming motion
M	Misstates prior testimony
NR	Non-responsive
O	Overbroad
V	Vague and ambiguous
30(b)(6)	Outside the scope of the Fed. R. Civ. Proc. 30(b)(6) deposition topics for which witness was designated
103	Assumes facts not in evidence
104	Lacks foundation

402	Not relevant
403	Probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence.
408	Settlement Negotiations
501	Privilege
602	Calls for speculation; speculative
611c	Leading
701	Improper opinion by lay witness
702	Improper opinion by expert
802	Hearsay
901	Not properly authenticated

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
Benjamin, David 08.29.2018	4:2 - 4:10		
	4:17 - 4:22		
	14:17 - 14:19		
	16:11 - 17:7		17:14-17:17 17:23-20:10 21:23-23:25 24:3-9 24:12-25:4 25:6-27:16
	27:17 - 29:12	SM, 402, 403	
	29:14 - 29:20	SM, 402, 403	
	33:3 - 34:8	SM, 402, 403	
	34:10 - 34:23	SM, 402, 403	
	35:1 - 35:18	SM, 402, 403	
	37:1 - 37:9	37:1-3—402, 403	
	37:12 - 37:14		
	37:16 - 38:4		
	38:11 - 38:13	Ex. Benjamin 3 (DX 21)— 403, 802, SM	
	39:6 - 39:16		39:17-20
	41:2 - 42:5		
	42:16 - 43:13	104, 602, 30b6, SM Ex. Benjamin 4 (DX 22)— 403, 802, SM	43:14-15
	43:16 - 43:18	104, 602, 30b6, SM	43:19-21
	43:23 - 44:7	104, 602, 30b6, SM	44:8-10
	44:12 - 45:20	104, 602, 30b6, SM	45:21-23
	46:1 - 46:4	104, 602, 30b6, SM	46:5-7
	46:8 - 46:12	104, 602, 30b6, SM	46:13-19
	46:20 - 47:5	104, 602, 30b6, SM	47:6-8
	47:9 - 47:11	104, 602, 30b6, SM	
	52:2 - 52:9	V, C, 103, 104	51:12-52:1 52:10-12

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	52:15 - 53:8	53:7-8—V, C, 103, 104	53:9-10
	53:11 - 53:16	53:11-12—V, 103, 104	53:17-18
	53:19 - 53:19	53:13-16—104, V, AA	57:9-59:8 62:11-64:12 64:19-24 65:6-8 65:13-66:4 66:7-11 66:17-21 66:24-67:5 67:22-68:21 89:21-23
	88:16 - 89:7	Benjamin Ex. 6 and 7 (DX23, DX24)—SM, 403, 802	91:22-92:14 119:10-11
	89:24 - 91:14	402, 30b6	
	117:12 - 119:9	Benjamin Ex. 14 (DX25)—402, 403, 802	
	119:12 - 120:1	119:9—V, 104, 602, 402, 403	
	138:4 - 138:7	V, 104, 602, 402, 403 V, 104, M, 30b6	62:11-64:12 64:19-24 65:6-8 65:13-66:4 66:7-11 66:17-21 66:24-67:5 67:22-68:21 138:8-10 138:20-22
	138:11 - 138:16	V, 104, M, 30b6	
	138:23 - 140:4	V, 104, M, 30b6	
	191:16 - 192:18	Benjamin Ex. 29 (DX 26)—402, 403, 802	192:19-20
	192:21 - 193:10	192:16-18—602	
	201:19 - 202:17	192:9-193:10—602 402	
Boswell, Gregory 08.08.2018	7:13 – 7:18		
	8:1 – 9:13		
	25:25 – 44:22	28:5-33:14 – M, 104, 402, 602 38:19-24 – V 39:11-16 – V 40:23-41:8 – 602, 30b6 41:10-15 – M, V 43:6-12 – V 44:2-7 – V 46:8-14 – M, V	14:7-16:15, 23:20-24:24
	45:17 – 47:20	53:14-19 – C	45:8-10, 13-15 47:22-24, 48:2-21
	52:11 – 59:19		
	60:22 – 62:14		
	68:1 – 69:14	68:4-17 – V, 103, 104, 602	
	70:15 – 84:25	71:10-23 – 103, 104	

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
		72:23-73:8 – V, M 73:16-23 – 104, 602 77:19-25 – C, 104, 602 80:18-81:12 – 104, 602 91:13-92:2 – 802, 104, 602	
	87:19 – 92:2 94:9 – 95:19 97:12 – 99:5 100:2 – 106:13 108:18 – 111:1 111:13 – 113:10 114:4 – 114:22 115:7 – 115:9 115:13 – 115:16 115:25 – 118:3 118:14 – 124:19 124:23 – 125:10 127:11 – 129:11 136:1 – 146:24 147:15 – 172:25 174:21 – 194:14		99:7-8, 10 106:14-25, 107:24-108:17 111:4-6 113:11-114:3 114:23-115:6 118:7-12 125:11-18 133:23-134:11
	194:22 – 204:1 205:1 – 208:25 209:13 – 210:4 211:14 – 213:2 213:12 – 214:6 214:16 – 243:25 246:4 – 254:25 255:6 – 260:3 260:15 – 263:25 264:3 – 264:22 265:16 – 266:21 267:23 – 279:3 280:9 – 284:19	168:19-169:11 – 103, 104 177:6-19 – V, 103, 104, 30b6 185:16-186:2 – IH, 104, 602 189:5-11 – CC, 701	
	285:1 – 285:10 285:13 – 290:25 291:10 – 294:1 294:11 – 316:6 317:12 – 321:16 324:6 – 326:3 328:24 – 331:13 332:1 – 345:7	249:6-15 – V, 103, 104 259:7-16 – 103, 104, 602 261:10-25 – 802 280:19-283:14 – 402, 403, 602 284:17-19 – 402, 403, 602 285:1-10 – 402, 403, 602 285:14-290:25 – 402, 403, 602	213:4-8 264:25-265:15 372:3-14
	345:12 – 345:22 346:22 – 351:21	Testimony and exhibits - 802, 402, 403, 103, 104 347:25-349:3 – V, 104 350:19-351:20 – CC, 104 360:22-361:20 – 402, 403, 103, 104, 30b6	316:7-317:11 326:5-13 To testimony on 344-45 – 378:1-14 To testimony on 350 – 373:6-374:10

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	359:22 – 364:25 366:1 – 366:12 366:25 – 369:12 370:6 – 371:18 378:20 – 383:25 384:14 – 384:21 386:1 – 386:15	364:16-25 – 402, 403, 103, 104, 30b6 402, 403, 103, 104, 30b6 Testimony and exhibits – 402, 403, 103, 104; Ex. 9 – also 802 Testimony and exhibit – 402, 403, 103, 104, 802 381:21-382:2 – V, 103, 104, D 103, 104, 402, 403, 602	To testimony on 349-50 – 376:5-22 384:1-8, 387:2-7
Boswell, Gregory 06.26.2019	396:8 – 396:12 397:22 – 398:23 399:5 – 399:12 400:16 – 400:20 405:24 – 405:25 406:1 – 406:9 406:13 – 406:17 407:2 – 407:25 408:1 – 408:11 409:8 – 409:16 411:6 – 413:4 413:21 – 416:24 417:1 – 418:22 421:12 – 424:20 424:25 – 434:25 439:1 – 452:12 453:16 – 453:20 454:4 – 464:13 464:18 – 466:25 467:9 – 499:17 513:14 – 524:9	398:5-20 – 402, 403 418:7-12, 21-22 – 30b6, V 427:18-428:14 – V, D 433:24-434:25 – ATTY, A, AA 439:1-11 – ATTY, A, AA 442:3-19 – M, 103, 104, A 443:8-444:1 – M, 103, 104, A 448:10-13 – ATTY 451:2-12 – V, 103, 104 451:17-25 – M, 103, 104, A 456:20-458:4 – AA, A, 103, 104 459:4-8 – ATTY 463:8-14 – 103, 104 464:18-466:12 and exhibit – 802, 901, 103, 104, 402, 403, 602 470:21-490:25 and exhibits – 802, 901, 103, 104, 402, 403, 602, SM 491:1-11 – V, 402, 403 492:13-494:25 and exhibit – 802, 402, 403, 103, 104, 602	499:18-512:25

[illegible]

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	13:5 - 16:20	13:5-13:11 - 402, 403, 802 13:12-14:10 - 402, 403, ATTY 14:11-15:2 - 104, 602, 402, 403, ATTY 15:3-15:6 - 802, 402, 403 15:7-16:20 - 402, 403, ATTY	
	17:4 - 17:5	402, 403	16:21-17:3 17:6-17:10 18:15-18:18
	17:11 - 18:14	104, 402, 403, ATTY	
	19:1 - 19:15	402, 403, ATTY, 104	
	19:16 - 20:3	402, 403, 104	
	20:4 - 21:7	20:4-20:6 - 402, 403, 104 20:7-21:7 - 402, 403, 104, 602 21:5-7 - 402, 403, 802	
	21:21 - 23:14	21:21-22:1 - 802, ATTY, 402, 403 22:2-22:23 - 402, 403, ATTY, 104 22:24-23:4 - 104, 402, 403 23:5-23:9 - 402, 403, 103, ATTY 23:10-23:14 - 402, 403, 103, ATTY, 104	23:15-17 23:19-20 23:22
	23:23 - 33:15	23:23-24:2 - 104, 402, 403, ATTY 24:3-24:17 - 30b6, 402, 403, ATTY 24:18-25:3 - 104, 402, 403 25:4-33:15 - 402, 403, ATTY, Exhibits -- 802, 901, 402, 403	
	33:20 - 51:25	402, 403, ATTY, Exhibits -- 802, 402, 403, SM, 901	
	52:1 - 84:10	402, 403, ATTY, Exhibits -- 802, 901, 402, 403	
	86:20 - 87:7	402, 403, ATTY	
	87:8 - 88:3	87:8-87:16 - 402, 403 87:17-88:3 - NR, 402, 403, ATTY	89:23-90:21 90:23-91:6 91:12-91:15 91:18-91:25 92:2 92:5-92:11 92:20-92:25 93:5-93:8 93:12-93:23 94:1-94:17 94:20 95:1-95:5 95:7

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
			96:3-96:11 96:14-96:18 96:20-97:8 97:10-97:13 97:24-98:11 98:14-98:18
Cruse, Jay 08.21.2018	5:16 - 5:25 6:1 - 6:25 7:21 - 8:11 9:6 - 9:14 9:23 - 10:3 10:21 - 12:13 14:4 - 14:8 15:25 - 16:2 16:3 - 16:13 16:22 - 17:11 18:2 - 18:11 19:11 - 19:15 19:19 - 20:6 20:19 - 21:8 22:20 - 23:4 24:16 - 26:5 26:17 - 27:5 27:21 - 28:4 28:5 - 28:7 28:8 - 28:17 29:1 - 30:11 34:22 - 35:4 34:22 - 35:8 35:5 - 35:8 36:20 - 36:25 37:9 - 37:24 38:2 - 38:16 39:7 - 39:24 48:1 - 48:13 48:18 - 48:25 49:10 - 50:23 50:24 - 51:6 53:17 - 53:24 55:19 - 56:6 56:6 - 56:18	11:21-12:9 - ATTY 22:23-22:25 - ATTY Exhibit - 901, 402 Testimony - 402, 403 402, 403 402, 403 402, 403 104, 402 402, 403 35:2-35:4 - 104 104 Testimony - ATTY, 402, 403, 104; Exhibit - 402, 403, 104, 901, BER Exhibit – 802, 402, 403 104, 602 49:21 - ATTY ATTY, 104, 603 55:19-56:1 - 104, ATTY 55:3-55:6 - 104 56:7-56:8 – ATTY 56:10-56:12 – 104 56:13-56:14 – ATTY 56:16-18 - 104	7:3-7:20 12:17-13:2 20:12-20:18 37:3-37:4 37:8 43:14-43:15 43:21-44:10 52:13-52:20 58:14-59:18

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
			59:23 - 60:4 60:6 61:15 - 64:21 65:7 - 65:25 66:6 - 66:12 69:1 - 69:9 69:15 - 69:21 70:8 - 70:13 70:19 - 71:8 71:18 - 71:25 72:22 - 73:4 73:13 - 73:14 73:16 - 73:19 74:4 - 74:14 75:24 - 76:4 76:6 76:8 - 76:14 82:16 - 83:19 83:21 - 84:10 84:12 - 84:16 84:18 - 85:11 85:15 - 85:16 85:24 - 86:3 86:8 - 86:21 87:1 - 87:14 88:7 - 89:12 89:18 - 89:23 90:8 - 91:1 92:9 - 92:24 93:11 - 16 94:22 - 95:1 97:24 - 98:2 98:4 - 12
Flott, Matthew 12.06.2018	5:8 - 5:17 8:23 - 9:9 25:10 - 25:17 26:16 - 26:25 27:2 - 27:5 27:8 - 27:15 27:22 - 28:2 28:19 - 28:21 28:23 - 29:4 29:6 - 29:9 29:12 - 29:15 29:17 - 29:21 29:24 - 30:6 30:9 - 30:14 30:17 - 30:24 31:2 - 31:6	104, V 28:23-24—104, V 30b6 30b6 29:17—30b6 29:25-30:6—104, M, V, C 30:9-12—104, M, V, C 30:17-19—30b6, V	28:3-5 28:7-18 28:22 29:10-11 29:16 30:7-8 30:15-16

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	31:8 - 31:14 32:21 - 32:24 33:2 - 33:5 33:7 - 33:7		32:7-11, 32:14-20
	38:10 - 38:18 38:21 - 38:21 40:21 - 41:4 41:6 - 41:8 41:10 - 41:12	38:17-18—602 602 V V V	38:19-20 40:2-6, 40:8-10, 40:13-20 41:5 41:9 42:11-14, 42:18-43:7, 43:10-17
	48:12 - 48:16 48:23 - 48:25 49:3 - 49:9 49:21 - 49:21	48:12—V, 30b6 V, 30b6 49:3—V, 30b6 49:4-9—104, M, V, 602, 30b6 104, M, V, 602, 30b6	48:17-22 49:2 49:10-20 49:22-51:3 95:9-98:13 98:16-99:7 52:13-15
	52:9 - 52:12 52:16 - 52:16 57:7 - 57:11 57:18 - 58:2	30b6 30b6 CC, 103, 104 57:18-19— CC, 103, 104 57:20-58:2—30b6	57:12-17 58:3-4
	58:5 - 58:9 58:12 - 58:12 58:13 - 58:16 58:19 - 58:23 59:2 - 59:2 65:4 - 65:7 65:10 - 65:13 65:15 - 65:25 66:4 - 66:7 66:10 - 66:12 73:15 - 73:16 73:24 - 74:4 80:22 - 80:24 81:3 - 81:9	30b6 30b6 V, C, 30b6 58:19— V, C, 30b6 V, C, 30b6 30b6 Highly Confidential, 30b6 Highly Confidential, 30b6 Highly Confidential, 30b6 Highly Confidential, 30b6 30b6 30b6	58:10-11 58:17-18 58:24-25 65:8-9 65:14 66:2-3 66:8-9 80:25-81:2 81:10-14 81:17-82:11
	86:8 - 86:12 86:16 - 86:22 87:2 - 87:4 87:6 - 87:6 87:17 - 87:21 88:2 - 88:6 88:8 - 88:17 88:19 - 89:4 89:9 - 89:10 89:12 - 90:12 90:16 - 90:18 90:20 - 90:20	30b6 30b6, V, 602, IH 30b6 30b6 30b6, V, 602 30b6, V, 602 30b6, V, 602 30b6, V, 602 30b6, V, 602 30b6, V, 602 30b6, V, 602 30b6, V, 602	86:13-15 86:23-25 87:5 87:22-25 88:7 89:5-8 89:11 90:13-15 90:19

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
Gallien, Jason 12.06.2018	6:1 - 6:16 12:21 - 12:24 28:23 - 29:5 29:7 - 30:3 30:10 - 30:23 30:25 - 30:25 34:3 - 34:12 39:15 - 40:9 43:9 - 43:16 45:20 - 46:23 48:16 - 49:4 49:11 - 49:21 66:19 - 66:21 69:21 - 70:8 70:18 - 70:25 73:12 - 73:13 73:21 - 74:7	29:15-30:3—Highly Confidential Highly Confidential Highly Confidential Highly Confidential Highly Confidential Highly Confidential Highly Confidential Highly Confidential V	24:25-26:17 33:1-20 80:18-84:24 65:17-66:18 73:14-20 74:8-12, 74:16-75:12
Glass, Jonathan 11.09.2018	6:6 - 6:14 11:15 - 12:6 20:5 - 20:17 25:20 - 25:24 28:18 - 29:8 29:9 - 30:9 35:3 - 35:8 38:18 - 39:2 41:6 - 45:3 45:4 - 45:9 68:19 - 69:2 74:13 - 74:17 74:23 - 75:13 76:6 - 76:10 76:22 - 77:17	402, V 602, 402, 104 104 402, 403, 104, 602 402, 403 402, 403 41:6-41:13 - Exhibit and Testimony - 104, 402, 403, 802, 901 41:20-42:2 - 104, ATTY, 402, 403 42:3-43:16: 104, 402, 403 43:17-44:16 -- Exhibit and Testimony -- 104, 402, 403, 802 44:17-45:3 - 402, 403 402, 403 68:19-68:23 – 402, 403 68:24-69:2 – V, 402, 403 402, 403 104, 402, 403 104, 402, 403 Testimony and Exhibit - 802, 402, 403, SM, 104, 901	20:18 - 22:1 22:4 - 23:23 26:1 - 9 39:2 - 39:9 39:15 - 39:22 45:10 - 45:11 45:19 -45:21 45:24 74:18 - 74:22

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	77:20 - 77:22 78:17 - 78:19 78:23 - 79:2 79:6 - 79:9	76:22 - D 402, 403 D, 103, 403 103, 104, 602 104, 602	85:22 - 86:10 86:14 - 86:16
	88:15 - 88:21 89:9 - 90:11	402, 403 89:9-89:18 - 402, 403 89:19-90:11 - 104, 602, 402, 403	
	90:21 - 90:24 91:9 - 91:13	104, 602, SM, 402, 403 402, 403	
	107:9 - 107:23	SM, 402, 403, 802	95:4 - 95:20 110:20 - 111:11 112:15 -113:2
	137:4 - 141:24	Highly Confidential, 402, 403, BER	
	143:24 - 144:17	Highly Confidential, 402, 403, 104, 602, BER	
	144:20 - 144:23	Highly Confidential, 402, 403, 104, 602, BER	
	145:6 - 149:16	145:6-11 -- Highly Confidential, 402, 403, 104, 602, BER; 145:12-149:16 -- Highly Confidential, 402, 403, BER	
	152:10 - 154:10	Highly Confidential, 402, 403; 154:8-10 -- additional 30(b)(6)	
	154:14 - 156:23	154:14-22 -- Highly Confidential, 402, 403, 30(b)(6); 154:23-155:21 -- Highly Confidential, 402, 403; 155:22-156:14 -- Highly Confidential, 402, 403, 602, 104; 156:15-23 -- Highly Confidential, 402, 403, 30(b)(6)	
	157:3 - 157:13	Highly Confidential, 402, 403, 602, 104, 30(b)(6)	
	157:18 - 158:1	Highly Confidential, 402, 403, 602, 104, 30(b)(6)	
	158:5 - 158:5	Highly Confidential, 402, 403, 602, 104, 30(b)(6)	
			166:2 - 167:1

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
Jang, Dong Li 08.30.2018	4:3 - 4:11 8:23 - 9:12 17:21 - 18:17 19:22 - 21:5 30:21 - 33:3 33:13 - 34:13 34:19 - 34:23 35:9 - 36:7 36:18 - 36:24 37:2 - 37:13 53:2 - 54:5 54:7 - 54:8 55:3 - 55:4 55:7 - 55:24 57:25 - 58:2 61:3 - 61:19 61:22 - 62:7 62:10 - 62:11 62:25 - 63:6 64:11 - 65:3 65:12 - 65:15 65:17 - 65:25 66:8 - 66:13 66:20 - 67:3 67:20 - 68:4 68:6 - 68:14 70:22 - 71:11 71:14 - 72:3 72:11 - 72:13 72:16 - 72:24 73:20 - 73:21 74:2 - 74:10 74:13 - 74:25 75:4 - 75:5 75:18 - 76:6 76:9 - 76:13 91:11 - 91:13 91:15 - 92:24 92:25 - 94:10 95:9 - 95:13 95:17 - 95:24 96:3 - 96:20 96:22 - 97:9 97:12 - 98:8 100:21 - 101:5	 D D 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM D Testimony and exhibit – 802, 901, 402, 403 Testimony and exhibit – 802, 901, 402, 403 Testimony and exhibit – 802, 901, 402, 403 Testimony and exhibit – 802, 901, 402, 403 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM Testimony and exhibit – 802, 402, 403, SM	 8:18-22 16:20-17:20 18:18-19:21

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	101:9 - 101:10	Testimony and exhibit – 802, 402, 403, SM	
	102:24 - 103:3	Testimony and exhibit – 802, 402, 403, SM	
	103:6 - 103:12	Testimony and exhibit – 802, 402, 403, SM	
	103:22 - 104:21	Testimony and exhibit – 802, 402, 403, SM	
	105:4 - 105:9	Testimony and exhibit – 802, 402, 403, SM	
	105:21 - 105:25	Testimony and exhibit – 802, 402, 403, SM	
	106:4 - 106:24	Testimony and exhibit – 802, 402, 403, SM	
	107:3 - 107:12	Testimony and exhibit – 802, 402, 403, SM	
	107:15 - 107:24	Testimony and exhibit – 802, 402, 403, SM	
	112:4 - 112:6	Testimony and exhibit – 802, 402, 403, SM	
	112:16 - 113:3	Testimony and exhibit – 802, 402, 403, SM	
	113:6 - 113:21	Testimony and exhibit – 802, 402, 403, SM	
	115:19 - 116:4		
	116:7 - 116:16		
	116:19 - 116:23		116:24-117:23
	120:19 - 121:7	Testimony and exhibit – 802, 402, 403, SM	
	125:23 - 126:3	Testimony and exhibit – 802, 402, 403, SM	
	126:6 - 126:15	Testimony and exhibit – 802, 402, 403, SM	
	126:21 - 128:16	Testimony and exhibit – 802, 402, 403, SM	
	128:18 - 129:3	Testimony and exhibit – 802, 402, 403, SM	
	129:7 - 129:14	Testimony and exhibit – 802, 402, 403, SM	
	130:15 - 131:10	Testimony and exhibit – 802, 901, 402, 403	
	131:13 - 131:18	Testimony and exhibit – 802, 901, 402, 403	
	132:5 - 132:22	Testimony and exhibit – 802, 901, 402, 403	
	132:25 - 133:7	Testimony and exhibit – 802, 901, 402, 403	
	133:24 - 134:12	Testimony and exhibit – 802, 901, 402, 403	

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	134:24 - 135:7 135:11 - 136:3 136:5 - 136:7 150:7 - 151:8 151:11 - 151:14 157:22 - 158:6 163:5 - 163:10 203:5 - 204:18 204:20 - 205:23	Testimony and exhibit – 802, 901, 402, 403 135:11-14 and exhibit – 802, 901, 402, 403	
Landis, Robert 12.12.2018	6:1 - 6:18 40:22 - 40:23 41:11 - 41:14 41:21 - 42:2 42:10 - 42:13 42:21 - 43:5 45:23 - 46:1 46:5 - 46:8 46:12 - 47:8 47:12 - 47:16 47:21 - 48:4 48:8 - 48:14 48:18 - 48:22 49:9 - 49:21 51:18 - 51:20 51:23 - 51:24 60:11 - 60:13 60:17 - 61:3 61:7 - 61:12 61:15 - 61:18 61:21 - 61:21 62:3 - 62:5 62:9 - 62:11 62:15 - 62:21 63:1 - 63:5 63:10 - 63:14 63:18 - 63:18 70:12 - 70:15 70:24 - 70:25	40:20-40:21 - D 104, 30(b)(6), 402, 403 104, 30(b)(6), 402, 403 104, 30(b)(6), 402, 403 104, 30(b)(6), 402, 403 104, 30(b)(6) 104, 30(b)(6) 46:12-46:14 - 30(b)(6), 104 47:5-47:8 - 30(b)(6), 104, 103 47:12-47:14 - 30(b)(6), 104, 103 47:15-47:16 - 30(b)(6), 104, 103 47:21-47:24 - 30(b)(6), 104, 103 47:25-48:4 - 30(b)(6), 104 30(b)(6), 104 30(b)(6), 104 30(b)(6), 104 30(b)(6), 104 30(b)(6), 104, V 30(b)(6), 104, V 104 104 104 30(b)(6), 104, V 62:9-62:10 - 30(b)(6), 104, V 62:11 - 30(b)(6), 104 62:15-62:19 - 30(b)(6), 104 62:20-62:21 - 30(b)(6), 104, V 63:1-3 - 30(b)(6), 104, V 63:4-63:5 - 30(b)(6), 104, V 63:10-63:11 - 30(b)(6), 104, V 63:12-63:14 - 104, 602, M 104, 602 30(b)(6), 403, V, 802 30(b)(6), 403, V, 802	40:22-40:23

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	73:14 - 73:16	30(b)(6), 403, 104	
	73:20 - 73:25	30(b)(6), 403, 104	
	74:6 - 74:10	74:6-74:7- 30(b)(6), 403, 104	
		74:8-74:10 - 30(b)(6), V, 104, 802, 602	
	74:13 - 74:23	74:13-74:19 - 30(b)(6), V, 104, 802, 602	
		74:20-23 - 30(b)(6), 104, 802	
	75:2 - 75:11	30(b)(6), 104, 802	
	76:1 - 76:4	30(b)(6), 104	
	76:22 - 77:10	76:22-76:24 - 30(b)(6), 104, 802	
		76:25-77:6 - 30(b)(6), 802, 104, 602	
		77:7-77:10 - 30(b)(6), 104, 602	
	80:8 - 80:11	30(b)(6), 104, V	
	80:15 - 80:17	80:15-80:16 - 30(b)(6), 104, V	
		80:17 - 30(b)(6), 104	
	80:21 - 81:8	80:21-80:23 - 30(b)(6), 104	
		80:24-81:8 - 30(b)(6), 104, 701	
	81:12 - 81:18	81:12-81:15 - 30(b)(6), 104, 802	
		81:16-81:18 - 30(b)(6), 104, 701	
	81:21 - 82:3	81:21-81:24 - 30(b)(6), 104, 701	
		81:25-82:3 - 30(b)(6), 104, 701	
	82:6 - 82:18	82:6-82:15 - 30(b)(6), 104, 701	
		82:16-82:18 - CC, 30(b)(6), 104, 701	
	82:22 - 83:1	CC, 30(b)(6), 602, 104, 802, 701	
	83:5 - 83:6	CC, 30(b)(6), 602, 104, 802, 701	
			87:1-87:7
			88:5-89:9
			89:13-89:23
			90:16-90:21
			91:4-92:6
			92:9-93:12
	93:18 - 93:24	402, 403, 602	
	94:17 - 94:19	30(b)(6), 602, 402, 403	
	98:21 - 98:23	V, 104	96:18-96:24
	99:1 - 99:4	99:1 - V, 104	98:4-98:17
		99:2-4 - 402, 403, 104	

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	99:7 - 99:13	402, 403, 104	99:14-99:21 100:1-100:12 100:17-101:6 103:6-104:9 104:19-108:2 108:4-108:11 108:18-109:11 109:21-109:24 110:2-110:7 115:1-119:6 119:9-119:18 119:20-121:5 122:11-123:3 124:3-124:22 125:2-126:23 127:10-128:3 128:10-128:22 129:20-130:2 130:5-130:11 130:14-130:18 130:20-130:23 133:9-133:14 135:7-135:15 135:18-135:22 136:13-136:18 137:4-137:10 138:6-138:12 144:5-144:20 145:2-145:10 145:13-145:17 149:8-149:21 149:25-150:7 150:17-150:19 150:21-150:22 152:20-155:7 155:10-155:15 155:18-156:14
Leak, Gary Wade 12.04.2018	4:5 - 4:15 60:12-62:20 62:21 - 63:14 64:15 - 64:21 67:3 - 68:10 68:13 - 68:15 72:5 - 72:8 75:8 - 75:10 75:17 - 75:24 85:15 - 85:19 86:8 - 86:13 93:11 - 93:25 98:19 - 99:2	501, 403 501, 403	85:20-86:7

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	99:14 - 99:17		
	99:22 - 100:2		
	100:5 - 100:5		
	104:20 - 104:23	30b6	104:24-25
	105:6 - 105:23	30b6	
	106:19 - 107:12	30b6	
	117:7 - 117:9	30b6	117:10-12
	117:13 - 117:19	30b6	
	121:6 - 121:8	30b6	121:9-11
	121:12 - 122:7	30b6	122:8-10
	122:15 - 122:18	30b6	
	122:19 - 122:25	30b6	123:2-4
	123:5 - 123:12	123:10-1—V, A, 104, 403, 501	123:13-14
	123:15 - 123:21	V, A, 104, 403, 501	
	123:25 - 124:11	403, 501	
	130:10 - 130:21		130:22-131:7
	136:3 - 136:8		136:9-137:16
	146:7 - 146:12	Ex. 4—403, 802, SM	
	148:23 - 149:11	104, V, 602, 403, 802, SM	149:12-13
	149:14 - 150:9	403, 802, SM	150:10-12
		150:6-9—104, V, 602	
	150:12 - 150:14	403, 802, SM, 104, V, 602	150:15-16
	150:17 - 150:23	403, 802, SM, 104, V, 602	
	159:20 - 159:24	403, 501	159:25-160:3
	160:4 - 160:9	403, 501	
	163:24 - 168:5	Highly Confidential 167:22-168:5—30b6 168:6-169:2—30b6	167:25-168:2
	168:6 - 168:11	Highly Confidential, 30b6	168:12-13
	168:14 - 168:17	Highly Confidential, 30b6	168:18-19
	168:20 - 168:23	Highly Confidential, 30b6	168:24-25
	169:2 - 169:2	Highly Confidential, 30b6	
	169:24 - 170:3	30b6	170:4-5
	170:6 - 170:17	30b6	170:18-19
	170:20 - 170:24	30b6	
	170:25 - 171:10	30b6	171:11-12
	171:13 - 171:22	30b6	171:23-24
	171:25 - 172:4	30b6	
	172:8 - 172:16		173:15-19 173:22-174:4 174:8-175:17
	179:5 - 179:10	403, 501	179:11-16
	179:17 - 180:3	403, 501	
	180:21 - 182:4	30b6, V	182:5-24
	182:25 - 183:8	V	183:9
	183:10 - 184:2	30b6	184:3-4
	184:5 - 184:15	30b6	185:5-11

[illegible]

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	253:2 - 253:13	Testimony and exhibit – 802, 901, 103, 104, 402, 403, 602	
	264:3 - 264:9		264:10-265:1
Sabec, Christopher 08.07.2018	8:17 - 8:20 9:18 - 9:25 14:16 - 14:20 16:3 - 16:4 16:22 - 16:24 17:1 - 19:12 22:5 - 25:7 26:11 - 26:15 27:20 - 27:22 45:7 - 45:9 45:12 - 45:23 50:6 - 50:25 51:7 - 55:11 57:4 - 60:14 76:21 - 78:4 90:5 - 91:17 92:2 - 92:10 92:25 - 94:18 95:5 - 95:8 96:2 - 96:22 112:12 - 113:11 114:8 - 116:1 116:10 - 116:16 117:8 - 120:25 121:7 - 122:25 123:4 - 124:8 142:23 - 152:10 156:4 - 158:22 159:1 - 162:10 162:12 - 163:3 163:20 - 165:15 166:8 - 166:25 167:2 - 167:13 168:12 - 168:17 169:1 - 170:19 176:7 - 177:12 178:20 - 180:14 183:13 - 186:12 191:20 - 195:21 197:23 - 203:14 207:8 - 208:6	D D 52:23-55:11 – 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403, SM 402, 403 402, 403, SM 146:4-149:1 – IH, 103, 104, 602, 701 165:17-166:6 184:3-186:6 – 103, 104, 602, 402, 403 186:8-12 – 802, 103, 104, 602 103, 104, 602, 402, 403, SM 197:23-199:21 – A 197:23-201:8 – CC, 103, 104, 402, 403, 602	45:25-46:2 78:5-13 113:13-21 116:17-18, 24 117:1-3, 6 177:13-178:17

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	216:20 - 226:10	Testimony and exhibit – 802, 103, 104, 602, 901	
	230:25 - 233:8	216:20-223:13 and exhibit – 802, 103, 104, 602, 901	
	235:4 - 236:1	Testimony and exhibit – 802, 103, 104, 402, 403, 602, 901	
	237:15 - 244:5	Testimony and exhibit – 802, 103, 104, 402, 403, 602, 901	
	247:9 - 248:5	237:15-238:15 and exhibit – 802, 103, 104, 402, 403, 602, 901	
	252:12 - 253:2		
	265:23 - 268:25	Testimony and exhibit – 802, 103, 104, 402, 403, 602, 901	
	277:2 - 280:18	Testimony and exhibit – 802, 103, 104, 402, 403, 602, 901	
	285:6 - 297:2	Testimony and exhibit – 802, 103, 104, 402, 403, 602, 901	280:19-281:5, 281:11-282:4
		287:15-293:17 – 501, 402, 403, SM	
		293:18-296:8 – 402, 403, SM	
	299:14 - 300:23	296:10-297:2 and exhibit – 802, 402, 403	297:3-299:13
	301:1 - 301:20	300:17-300:23 – A, 402, 403	
		301:1-4 – A, 402, 403	
	302:25 - 309:14	301:6-20 and exhibit– 802, 402, 403	
	312:8 - 313:4	305:15-309:14 – 802, 103, 104, 402, 403, SM	
	313:8 - 313:14	Testimony and exhibit – 802, 402, 403, SM	
	313:22 - 321:25	Testimony and exhibit – 802, 402, 403, SM	
	342:8 - 344:1	Testimony and exhibit – 802, 402, 403, SM	
	345:10 - 345:14	CC, 701, 403, 602	
	348:15 - 348:19		
	349:6 - 349:23	Testimony and exhibit – 802, 402, 403	
		Testimony and exhibit – 802, 402, 403	
	353:8 - 353:18		
	354:12 - 355:8		
	357:18 - 358:6		
	365:18 - 366:17		359:24-360:4, 14-15
	368:4 - 369:3	402, 403, SM	
		368:4-369:2 – 402, 403, SM	
Sheckler, Victoria 12.11.2018	8:4 - 8:6 8:13 - 8:23 10:9 - 10:24		10:25-11:6, 27:2-8

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	12:20 - 13:4		14:1-12
	16:10 - 16:21		
	22:9 - 22:12		22:13-26:3
	32:2 - 32:6	D, 30b6, 104, V	32:13-16
	32:18 - 33:5		
	33:22 - 33:23	30b6	33:18-21
	34:2 - 34:4	30b6	33:24-34:1
	34:14 - 35:4	501, 403, V, 30b6, 104	35:5-11
	35:12 - 36:10	501, 403, V, 30b6, 104	
	36:22 - 36:25	V, 104	37:1-2
	37:3 - 37:7	V, 104	37:8-9
	37:10 - 37:14	V, 104	
	39:11 - 39:18	39:16-25—30b6, V, 104	39:19-21
	39:22 - 40:7	40:5-6—30b6, V, 104	40:8-10
	40:11 - 40:14	40:11—30b6, V, 104	40:15-16
		40:13-14—30b6	
	40:23 - 40:24	30b6, 104, V, 501, 403	40:25-41:6
	41:7 - 41:7	30b6, 104, V, 501, 403	
	43:18 - 43:20	30b6	43:21-22
	43:23 - 44:14	30b6	
	44:20 - 44:24		
	45:3 - 45:10		
	45:25 - 46:6	Ex. 4—802, SM	
	46:9 - 46:9		
	46:16 - 46:19	104	46:20-21
	46:22 - 47:2	47:13—501, 403	47:3-4
	47:5 - 47:13	501, 403	47:14-15
	47:16 - 47:17		
	48:24 - 49:7		
	49:16 - 49:21		
	49:25 - 50:8	30b6	
	50:14 - 50:20	30b6	50:21-22
	50:23 - 52:13		
	55:8 - 56:3	Exs. 6,7, and 8—402, 403, SM	
	56:23 - 57:2	30b6	57:3-7
	57:9 - 59:3	501, 403	59:4-9
		59:1-3—30b6	
	59:10 - 59:19	30b6	59:20-22
	64:7 - 64:16	64:14-16—30b6	64:17-21
	64:22 - 65:7	64:22—30b6, 65:6-7—30b6	65:8-10
	65:11 - 65:15	30b6	
	66:2 - 66:5	30b6	66:6-10
	66:11 - 66:15	30b6	
	68:13 - 68:25	30b6, A, CC, IH, V, 30b6, 104, 402, 403	69:1-5
	69:6 - 69:7	30b6, A, CC, IH, V, 30b6, 104, 402, 403	
	69:16 - 69:19	30b6	69:20-24
	69:25 - 70:2	30b6	70:6-9
	70:10 - 70:15	30b6	70:16-17

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	70:19 - 71:2	30b6, 501, 403	71:3-8
	71:9 - 71:23	30b6, 501, 403	71:24-72:4
	72:5 - 72:5	30b6	
	72:7 - 72:18	Ex. 8—402, 403, SM	
	72:22 - 73:4	30b6	73:5-9
	73:10 - 73:18	30b6	73:19-20
	73:21 - 73:25	30b6	74:1-2
	79:23 - 80:1	30b6	80:2-4
	80:6 - 80:11	30b6	80:12-16
	80:17 - 80:25	501, 403, 30b6	81:1-2
	81:3 - 81:8	501, 403, 30b6	
	97:4 - 97:11	Ex. 9—402	
	98:7 - 98:22		
	99:13 - 99:21		99:22-25
	100:1 - 100:7	402	
	100:10 - 100:17	402	
	100:20 - 100:20	402	
	100:22 - 101:15	402	
	101:16 - 102:7	402	
	102:25 - 103:3	103, 104	103:4-5
	103:6 - 103:17	103, 104	103:18-19
	103:20 - 103:20	103, 104	
	103:22 - 104:11	30b6	104:12-13
	105:2 - 105:4	30b6	105:5-6
	105:7 - 105:10	30b6	105:11-13
	105:14 - 105:21	30b6	105:22-24
	105:25 - 106:7	30b6	
	106:10 - 106:14	30b6	106:15-16
	106:17 - 107:14	30b6	107:15-17
	107:19 - 107:25	30b6	108:1-2
	108:3 - 108:17	30b6	108:18-19
	108:20 - 108:21	30b6	
	108:23 - 109:4		
	109:7 - 110:5		
	110:8 - 110:15	30b6	110:16-20
	110:21 - 111:8	30b6	
	111:11 - 111:21		111:22-112:1
	112:2 - 112:6		
	113:8 - 114:13	114:11-13—30b6, 103, 104	114:14-17
	114:18 - 114:23	30b6, 103, 104	114:24-115:2
	115:3 - 116:9	30b6, 103, 104	116:10-11
	116:12 - 116:23		116:24-25
	117:1 - 117:9	103, 104, C, V	
	121:13 - 121:16	SM, 104, 402, 403	121:17-18
	121:19 - 122:3	SM, 104, 402, 403	122:4-5
	122:6 - 122:17	SM, 104, 402, 403	122:18-19
	122:20 - 123:9	SM, 104, 402, 403, 501	
	123:16 - 124:23	SM, 104, 402, 403	
	126:12 - 127:10		
	128:3 - 128:8		

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	144:17 - 144:18	30b6	144:19-23
	144:24 - 145:5	30b6	145:6-9
	145:10 - 145:13	30b6	145:14-15
	145:16 - 145:19	30b6	145:20-21
	145:22 - 146:1	30b6	146:2-4
	146:5 - 146:7	30b6	146:8
	146:9 - 146:11	30b6	146:12
	146:13 - 146:15	30b6	146:16
	146:17 - 146:20	30b6	146:21
	146:22 - 146:22	30b6	
	148:2 - 148:16	Ex. 8—402, 403, SM 30b6 148:14-22—103, 104	148:17-19
	148:20 - 149:4	30b6	149:5-6
	149:7 - 149:8	30b6	
	159:23 - 160:4	30b6	160:5-7
	160:8 - 160:16	30b6	160:17-18
	160:19 - 161:2	30b6	161:3-4
	161:6 - 161:12	30b6	161:13-15
	161:16 - 161:20	30b6	161:21-22
	161:23 - 162:3	30b6	162:4-5
	162:6 - 162:6	30b6	
	163:2 - 163:4	30b6	163:5
	163:6 - 163:10	30b6	163:12
	163:15 - 163:18	30b6	163:19-20
	163:21 - 163:21	30b6	
	163:23 - 163:24	30b6	163:25-164:1
	164:2 - 164:12	30b6	164:13-15
	164:16 - 164:20	30b6	164:21-22
	164:23 - 165:7	30b6	165:8-9
	165:11 - 165:19	30b6	
	167:16 - 168:16	Ex. 17—402, Subject to Court Order (ECF 191) 402, Subject to Court Order (ECF 191), 30b6	168:19-23
	168:25 - 169:8	Ex. 18—402, Subject to Court Order (ECF 191) 402, Subject to Court Order (ECF 191), 30b6	169:9-20
	169:21 - 170:15	402, Subject to Court Order (ECF 191), 30b6	170:16-18
	170:19 - 170:23	402, Subject to Court Order (ECF 191), 30b6	170:25-171:1
	171:3 - 171:5	402, Subject to Court Order (ECF 191), 30b6	171:6-8
	171:9 - 171:21	402, Subject to Court Order (ECF 191), 30b6	171:22-23
	171:24 - 172:7	402, Subject to Court Order (ECF 191), 30b6, 103, 104	172:8-12

<u>Deposition</u>	<u>Page/Line</u>	<u>Objections</u>	<u>Counter-Designations</u>
	172:13 - 172:21	402, Subject to Court Order (ECF 191), 30b6, 103, 104	172:22-24
	172:25 - 173:4	402, Subject to Court Order (ECF 191), 30b6	173:5-13
	173:14 - 174:2	402, Subject to Court Order (ECF 191), 30b6	174:3-4
	174:5 - 174:16	402, Subject to Court Order (ECF 191), 30b6	
	174:20 - 175:24	402, Subject to Court Order (ECF 191), 30b6	174:17-19
	204:18 - 204:20	SM, 402, 403, 30b6	204:21-25
	205:1 - 205:6	SM, 402, 403, 30b6	205:7-8
	205:9 - 205:10	SM, 402, 403, 30b6	
	205:11 - 205:22	SM, 402, 403, 30b6	205:23-24
	205:25 - 206:12	SM, 402, 403, 30b6	206:14-15
	206:16 - 206:19	SM, 402, 403, 30b6	206:20-24
	206:25 - 207:2	SM, 402, 403, 30b6	
	208:10 - 208:12	SM, 402, 403, 30b6	208:13-15
	208:16 - 209:1	SM, 402, 403, 30b6	209:2-3
	209:4 - 209:11	SM, 402, 403, 30b6	
	211:15 - 211:20		
	211:23 - 212:4	103, 104, 30b6	212:5-6
	212:7 - 212:9	103, 104, 30b6	212:10-13
	212:14 - 213:6	30b6, 104	213:7-10
	213:11 - 213:24	213:11-12—30b6 213:21-24—104, C	213:25-214:1
	214:2 - 214:8	104, C	
	259:4 - 259:13	SM, 103, 104, V	259:14-15
	259:16 - 259:17	SM, 103, 104, V	
	259:20 - 259:23	SM	
	260:11 - 260:11	SM	

Dated: January 30, 2020

Respectfully submitted,

By: /s/ Andrew H. Bart
 Andrew H. Bart (admitted *pro hac vice*)
 Jacob L. Tracer (admitted *pro hac vice*)
Jenner & Block
 919 Third Avenue
 New York, NY 10022
 Telephone: (212) 891-1600
 Facsimile: (212) 891-1699
 abart@jenner.com
 jtracer@jenner.com

Jonathan E. Missner (admitted *pro hac vice*)
 Robert B. Gilmore (admitted *pro hac vice*)
 Philip J. O'Beirne (admitted *pro hac vice*)

Michael A. Petrino (admitted *pro hac vice*)
Kevin J. Attridge (admitted *pro hac vice*)

Stein Mitchell Beato & Missner LLP

901 15th Street, N.W., Suite 700

Washington, DC 20005

Telephone: (202) 737-7777

Facsimile: (202) 296-8312

jmissner@steinmitchell.com

rgilmore@steinmitchell.com

pobeirne@steinmitchell.com

mpetrino@steinmitchell.com

kattridge@steinmitchell.com

Daniel C. Bitting (State Bar No. 02362480)

Paige A. Amstutz (State Bar No. 00796136)

Scott Douglass & McConnico LLP

303 Colorado Street, Suite 2400

Austin, TX 78701

Telephone: (512) 495-6300

Facsimile: (512) 495-6399

dbitting@scottdoug.com

pamstutz@scottdoug.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that on January 30, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

/s/ Daniel C. Bitting
Daniel C. Bitting